
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

United States of America,)	
)	
)	
)	
Plaintiff)	Civil Case Number: 3:18-cv-37 (BKS/DEP)
)	
v.)	
)	
Christopher Duryea a/k/a)	
Christopher J. Duryea)	
)	
Defendant)	

COMPLAINT FOR MONEY OWED TO THE UNITED STATES

The United States of America, plaintiff, alleges that:

Jurisdiction

1. This Court has jurisdiction over the subject matter of this action pursuant to Article III, Section 2, U.S. Constitution 28 U.S.C. Sec. 1345.
2. This Court has personal jurisdiction over the defendant(s) residing at 11 Orton Avenue, Binghamton, New York 13905.

STATEMENT OF THE CLAIM

3. The Defendant(s) is indebted to the United States for the following amounts:

- A. Principal: \$25,348.94
- B. Date of Default: 3-18-2011
- C. Accrued Interest Rate per Annum: 4.375%

4. Said amounts remain unpaid up to and including the date of this Complaint.

5. Defendant refuses to remit complete payment to the plaintiff.

6. The Certificates of Indebtedness, attached as Exhibit "A" shows the total owed excluding attorney's fees and Court costs and related charges. The principal balance and the interest balance shown on the Certificate of Indebtedness is correct as of the date of the Certificate of Indebtedness after application of all prior payments, credits, and offsets. Prejudgment interest accrues at 4.375% per annum from the dates of default stated in Exhibit "A".

WHEREFORE, the United States of America prays for judgment:

A. For the sums set forth in the annexed Certificate of Indebtedness plus prejudgment interest through the date of judgment, all administrative costs, and service of process costs allowed by law, and post-judgment interest pursuant to

28 U.S.C. § 1961 with that interest on the judgment at the legal rate per annum until paid in full;

B. For such other relief which the Court deems proper.

Respectfully submitted,

BY: /s/ John S. Manfredi
John S. Manfredi
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U. S. DEPARTMENT OF EDUCATION
SAN FRANCISCO, CALIFORNIA

CERTIFICATE OF INDEBTEDNESS #1 OF 1

CHRISTOPHER DURYEA
AKA CHRIS DURYEA
AKA CHRISTOPHER J DURYEA
11 ORTON AVE
BINGHAMTON, NY 13905
Account No. XXXXX9721

I certify that U.S. Department of Education records show that the BORROWER named above is indebted to the United States in the amount stated below plus additional interest from 11/22/17.

On or about 02/11/10, the BORROWER executed a promissory note to secure a Direct Consolidation loan from the U.S. Department of Education. This loan was disbursed for \$10,196.21 & \$15,152.73 on 05/14/10 at 4.375% interest per annum. The loan was made by the Department under the William D. Ford Federal Direct Loan Program under Title IV, Part D of the Higher Education Act of 1965, as amended, 20 U.S.C. 1087a et seq. (34 C.F.R. Part 685). The Department demanded payment according to the terms of the note, and the BORROWER defaulted on the obligation on 03/18/11. Pursuant to 34 C.F.R. § 685.202(b), a total of \$0.00 in unpaid interest was capitalized and added to the principal balance.

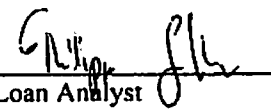
The Department has credited a total of \$35.00 in payments from all sources, including Treasury Department offsets, if any, to the balance. After application of these payments, the BORROWER now owes the United States the following:

Principal:	\$25,348.94
Interest:	\$8,315.13
Total debt as of 11/22/17:	\$33,664.07

Interest accrues on the principal shown here at the rate of \$3.04 per day.

Pursuant to 28 U.S.C. § 1746(2), I certify under penalty of perjury that the foregoing is true and correct.

Executed on: 12/21/17


Loan Analyst
Litigation Support Unit

Philippe Guillon
Loan Analyst